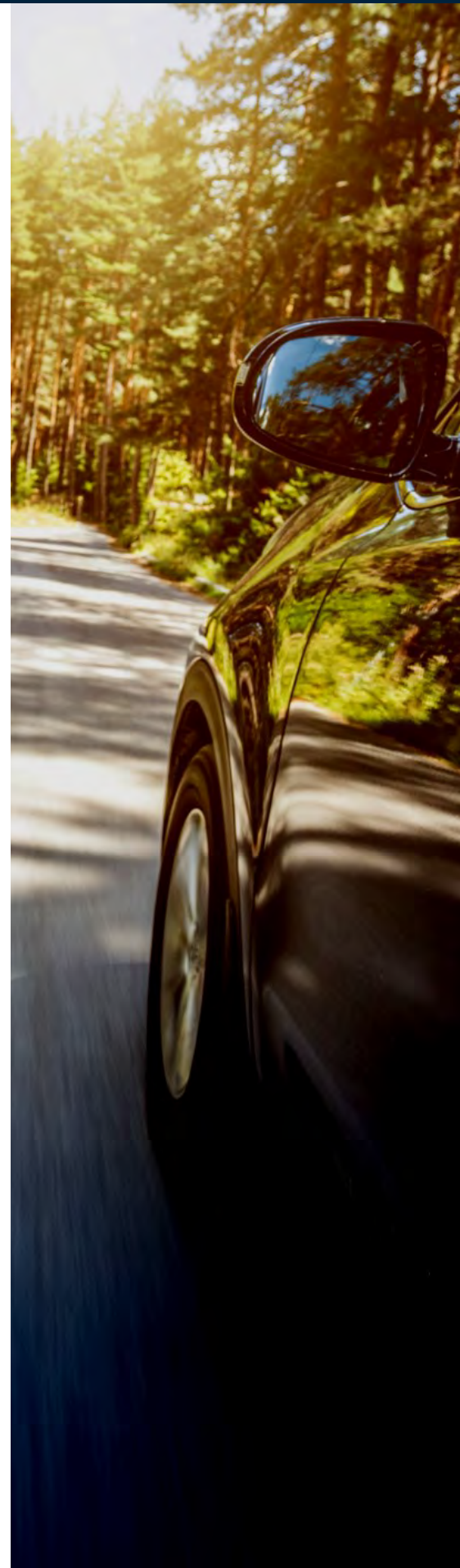


Driving Authority for Unauthorized Immigrants

Office of Performance Evaluations
Idaho Legislature





Senator Mark Harris (R) and Representative Ilana Rubel (D) cochair the committee.

Office of Performance Evaluations

Created in 1994, the legislative Office of Performance Evaluations (OPE) operates under the authority of Idaho Code §§ 67-457–464. Its mission is to promote confidence and accountability in state government through independent assessment of state programs and policies. The OPE work is guided by professional standards of evaluation and auditing.

Joint Legislative Oversight Committee 2021–2022

The eight-member, equally bipartisan Joint Legislative Oversight Committee (JLOC) selects evaluation topics; OPE staff conduct the evaluations. Reports are released in a public meeting of the committee. The findings, conclusions, and recommendations in OPE reports are not intended to reflect the views of the Oversight Committee or its individual members.

Senators



Mark Harris



Dave Lent



Michelle Stennett



David Nelson

Representatives



Ilana Rubel



Caroline Nilsson Troy



Paul Amador



Steve Berch

From the director

January 21, 2021

Members

Joint Legislative Oversight Committee

Idaho Legislature

Sixteen states and the District of Columbia allow unauthorized immigrants to obtain driving authority. At the time of our evaluation, states lacked sufficient data to conclusively show how driving authority affects automobile insurance and road safety.

However, studies do show that unauthorized immigrants with **access to a driver's license are more likely to hold a job and work more hours per week** than those who do not have access.

Two program designs in other states could serve as models for consideration. If the Legislature were to grant driving authority to unauthorized immigrants, the cost to provide such authority would be offset by revenue from fees of the program.

My sincere thanks to officials and staff of the Department of Transportation and the Commission on Hispanic Affairs for their assistance and cooperation.



Sincerely,

A handwritten signature in blue ink that reads "Rakesh Mohan". The signature is fluid and cursive.

Rakesh Mohan, Director
Office of Performance Evaluations



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Formal responses from the Governor, the Idaho Transportation Department, and the Commission on Hispanic Affairs are in the back of the report.



Casey Petti conducted this evaluation. Margaret Campbell copy edited and desktop published the report.

Quality control review was provided by Bob Thomas of Robert C. Thomas and Associates and Ann Morse, National Conference of State Legislatures.

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Executive summary



Why we were asked to do this evaluation

Requesters of this evaluation wanted to understand how a driving authorization program for unauthorized immigrants would affect Idaho in areas of automobile insurance, road safety, and criminal justice system. They also wanted to know about the experiences of other states that have permitted unauthorized immigrants to legally drive.

What we found

Though regulation of immigration is a federal issue, states have the authority to extend state-level programs to unauthorized immigrants, including driving authorization.

Sixteen states and the District of Columbia allow unauthorized immigrants to obtain driving authority. Except for New Mexico, Utah, and Washington, all other states have created their programs since 2013.

Because most of these programs are new, states do not have enough data to show how unauthorized immigrants with driving authority affect automobile insurance and road safety. However, studies have shown that unauthorized immigrants with access to **a driver's license are more likely to hold a job and work more hours per week than those who do not have access**. Obtaining a **driver's license could increase their work productivity and job availability**.

Costs for a driving authority program would be offset by revenue from programs fees.

Any policy to grant driving authority to unauthorized immigrants cannot violate federal law.

Two program designs in other states could serve as models for consideration.

Other states use two major program designs to implement driving authority for unauthorized immigrants: (1) a standard non-**Real ID compliant driver's license** and (2) a standalone driving credential.

Costs for a driving authority program would be offset by revenue **from programs fees. For a standard driver's license, the Idaho** Transportation Department (ITD) would incur minimal start-up costs because an administrative system is already in place. ITD would incur additional start-up costs to begin a standalone driving authorization card, though these costs could be offset by fees to obtain the card.

If the Legislature were to decide to grant unauthorized **immigrants a standard driver's license, it would need to amend** Idaho Code that specifically requires lawful presence in the United States to apply for the license. A standard license would use parameters already in place for eligibility requirements, fees, and length of validity for the license.

If the Legislature were to decide to grant unauthorized immigrants a new driving credential, policymakers would have more discretion to specify parameters of the card such as length of validity, cost of application, and eligibility requirements. A new driving credential would offer more flexibility than a class D license program.

Any policy to permit unauthorized immigrants to obtain driving authority must not violate federal law. Unauthorized immigrants **cannot obtain a commercial driver's license or use any license or** driving credential for Real ID purposes, such as proving identification to the Transportation Security Administration or entering a federal building. The licenses would need to identify the holder as being ineligible for certain federally regulated activities, such as purchasing a firearm.

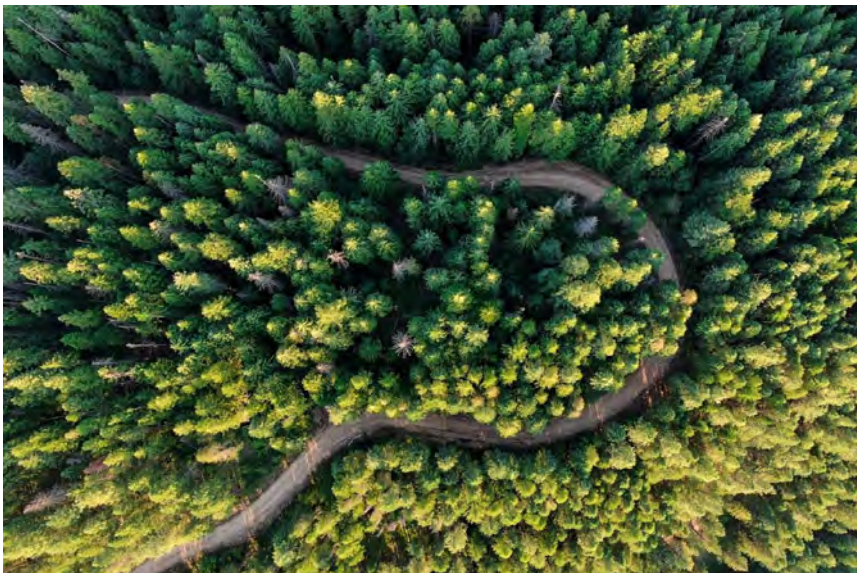
Parameters should be established that identify which Division of Motor Vehicles (DMV) information would be shared with federal authorities. Unauthorized immigrants may be hesitant to apply for a driving credential if they believe their personal information will be given to federal immigration authorities. Conversely, states are required to share certain DMV information with the federal government for certain federal programs.

Conclusive data do not exist about how driving authorization would affect automobile insurance or road safety, and the effects on the criminal justice system would likely be minimal.

Studies have not consistently demonstrated that licensing unauthorized immigrants influences the uninsured motorist rate or insurance premiums in a state. Most licensed unauthorized immigrants would be expected to get insurance.

Empirical evidence does not indicate that licensing unauthorized immigrants reduces the total number of automobile accidents, though it may change the severity and type of accidents. State and national data show that accidents involving unlicensed drivers are three times deadlier than accidents involving licensed drivers. Licensing unauthorized immigrants may reduce the severity of accidents they are involved in. Additionally, two states have experienced a reduction in hit-and-run accidents after giving unauthorized immigrants driving authorization.

Recent changes to Idaho Code reduced the penalty for driving without privileges from a misdemeanor to an infraction. This change lessened the chance an unauthorized immigrant would be detained by federal immigration authorities for driving without a license. Additionally, an individual cannot be arrested for a motor vehicle infraction alone, potentially reducing the burden on the criminal justice system.



Licensing unauthorized immigrants may reduce the severity of accidents they are involved in.

1

Introduction

Background and legislative intent

The federal Real ID Act of 2005 created requirements that states **must adhere to for their driver's licenses to be recognized forms** of federal identification. For example, a noncitizen must have documented legal presence in the United States to be eligible for a Real ID license. However, the act allows states to issue non-Real ID compliant licenses if the license clearly indicates it cannot be accepted for federal identification purposes, and it has a visual difference from a Real ID compliant license.

In recent years an increasing number of states have begun allowing unauthorized immigrants to obtain legal driving authorization following the guidelines of the Real ID Act. In 2010 only three states, New Mexico, Utah, and Washington, allowed unauthorized immigrants to drive. Today, 13 states and the District of Columbia grant some form of driving credential to unauthorized immigrants. As shown in exhibit 1, three more states, New Jersey, Oregon, and Virginia, will start allowing unauthorized immigrants to drive in 2021.

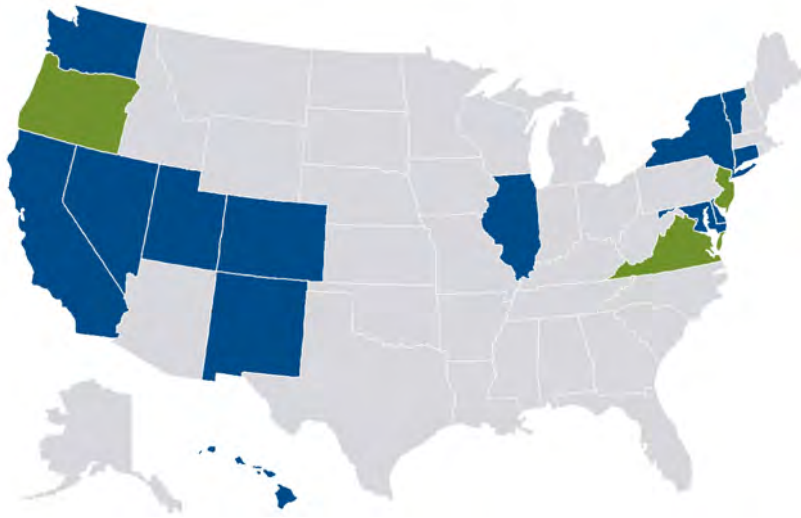
Unauthorized immigrants

Unauthorized immigrants are defined by the US Department of Homeland Security as all foreign-born noncitizens who are not legal residents. Unauthorized immigrants are primarily either individuals who entered the United States without inspection or who were admitted temporarily and stayed beyond the date they were required to leave.



Exhibit 1

In 2020, 13 states offered driving credentials to unauthorized immigrants, with 3 additional states slated to offer driving credentials in 2021.



Source: National Conference of State Legislatures.

Idaho Code has prohibited unauthorized immigrants from obtaining an Idaho driver's license since 1998. The law, Idaho Code § 49-303(14) and § 49-306(3)(b), requires that noncitizens prove lawful presence in the United States to be eligible to apply for a standard class D license.

Legislators requesting this evaluation wanted to understand how a driving authorization program for unauthorized immigrants would affect Idaho in areas such as automobile insurance, road safety, and criminal justice system. Additionally, requesters wanted to know the experiences of states that have permitted

Idaho requires driver's license applicants to have proof of lawful presence.

Real ID Act of 2005

Congress passed the Real ID Act of 2005 to set national security and documentation standards for state-issued licenses and identification cards. Cards that do not meet these standards cannot be accepted for federal identification. The Idaho Transportation Department (ITD) created the Star Card to meet requirements of the Real ID Act.



unauthorized immigrants to legally drive. Their evaluation request is in appendix A.

Granting driving authority to unauthorized immigrants is a policy issue, and we will not suggest whether this authorization should be extended. Instead, we will outline program design options should policymakers decide to allow unauthorized immigrants to drive. Additionally, we look at outcomes from programs in other states and the costs and revenue of a potential program in Idaho. The scope of the evaluation can be found in appendix B and the methodology in appendix C.

State's role in immigration

Immigration regulation and enforcement is a federal government responsibility. Individual states do not have the authority to create or implement immigration policy, nor can they deport or remove unauthorized immigrants living under their jurisdiction.



However, states have authority to extend state-level programs to unauthorized populations living under their jurisdiction. States have used policies like granting driving authority to unauthorized populations to meet the needs of unauthorized immigrants living in the state.

Unauthorized immigrants who hold state driving credentials are not documented legal residents of the United States. State policies that grant such authority do not supersede federal immigration law. Unauthorized immigrants with state driving credentials are still subject to detainment and deportation by federal immigration authorities.

Unauthorized immigrant demographics

The number of unauthorized immigrants in Idaho varies by source and method used to calculate the population. We used the **Center for Migration Studies’ estimate of 37,438 unauthorized immigrants in 2018.**¹

The Center for Migration Studies found that the estimated population of unauthorized immigrants in Idaho grew by 4,000, **or approximately 12 percent, from 2010 to 2018. Idaho’s growth** of unauthorized immigrant population is contrary to the national trend, which saw a decrease of 1.2 million unauthorized immigrants or approximately 10 percent from 2010 to 2018. Most unauthorized immigrants in Idaho, 81 percent, came to the United States before 2013.

Unauthorized immigrants are closely split between male and female, with 51 percent male and 49 percent female. Most of the population, 91 percent, are between the ages of 18 and 64.

Of the estimated 19,000 married unauthorized immigrants, 7,000 are married to either to a US citizen or a legal immigrant. **The Pew Research Center estimates that 5.7 percent of Idaho’s** K–12 students in 2016 had at least one unauthorized immigrant parent.

According to the Center for Migration Studies, 79.4 percent of **Idaho’s unauthorized immigrants are from Mexico, and 86.8** percent overall come from either Mexico or Central America. Spanish is the most dominant language of unauthorized immigrants, with 86.2 percent of unauthorized immigrants speaking Spanish at home. Half of unauthorized immigrants speak little to no English.

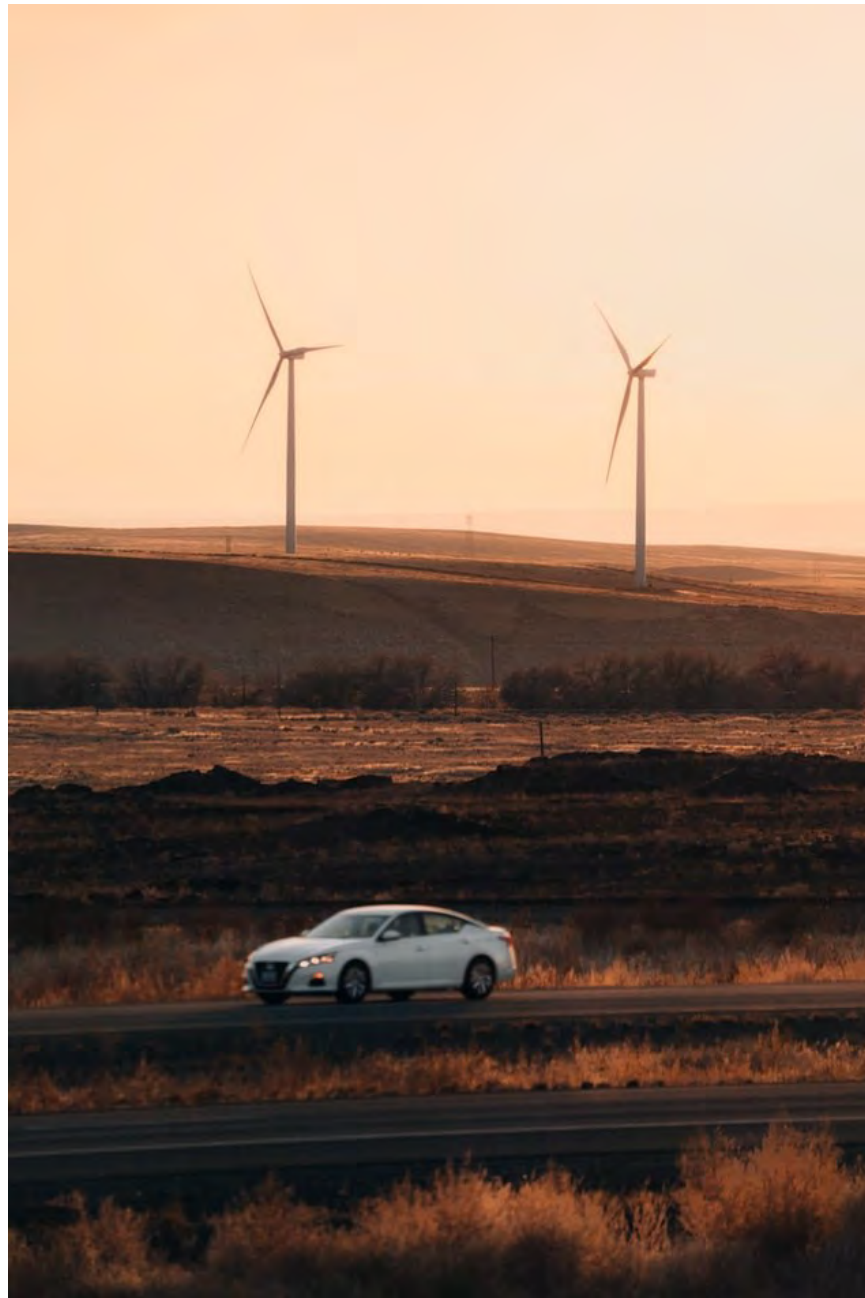
In 2018, 79.4 percent of unauthorized immigrants were in the **labor force and represented 3.3 percent of Idaho’s entire labor** force. Unauthorized immigrants pay an estimated \$21–29 million in state and local taxes annually.

**An estimated
37,000
unauthorized
immigrants live
in Idaho.**

1. We chose the Center for Migration Studies because of its timeliness and recognized credibility within the field of immigration research. **Other sources also estimated Idaho’s unauthorized immigrants,** including Pew Research Center at 35,000 in 2016 and the Migration Policy Institute at 30,000 in 2016.

**40% of
agricultural
workers in Idaho
are unauthorized
immigrants.**

In Idaho, unauthorized immigrants primarily work in the agricultural, manufacturing, and services sectors. They comprised roughly 40 percent of all agricultural workers in 2016, excluding sole proprietorships. The Center for Migration Studies estimates that **4.6 percent of Idaho's essential workers are unauthorized immigrants.**



Program design options



Programs that allow unauthorized immigrants to drive have been relatively stable since their implementation. The last state to remove driving authorization from unauthorized immigrants was Hawaii in 2010, when it passed a bill requiring that applicants prove legal residency in the United States.² However, Hawaii has since reinstituted a program that allows unauthorized immigrants to get driving authorization. A list of all states that allow unauthorized immigrants to drive and information on their programs can be found in appendix D.

States use two main program designs to implement driving authorization: (1) a standard non-**Real ID compliant driver's** license and (2) a standalone driving credential. We found no consensus on which design is best. Program design elements mostly come down to policy decisions.

2. In 2013 the Oregon legislature passed SB 833 which allowed **unauthorized immigrants to apply for a driver's license**. That bill was overturned by a ballot measure before going into effect.

8 states allow unauthorized immigrants to get a standard driver's license.

ITD offers the written driving test in 11 languages.

A standard class D driver's license would reduce the workload of initial program development.

Two neighboring states, Oregon and Washington, allow **unauthorized immigrants to get a standard driver's license**. For **Idaho to grant unauthorized immigrants a standard driver's license**, known as a class D license, the Legislature would have to amend two sections of Idaho Code. These sections explicitly forbid individuals without lawful presence in the United States **from obtaining a driver's license**. **Amending Idaho Code** would also simplify the process for legal immigrants applying for a **driver's license by removing the requirement that they provide documents proving lawful presence in the United States**.³

Granting unauthorized immigrants a class D license would use **the administrative system that Idaho already in place for driver's licenses**. Unauthorized immigrants would be eligible for a license if they meet the eligibility requirements for a class D license, such as being at least 15 years old and passing the written knowledge and driving tests.

Many services of the driver's license administration are already available in foreign languages, which would increase the ease of implementation. The written knowledge test is available in 11 languages. ITD also offers third-party telephone translation services. Unlike other states, Idaho has no specific laws or regulations forbidding translators from accompanying applicants to their driving skills tests.

3. Federal law would still require that driver's license applicants with a Social Security number provide the number at the time of application. States have required applicants who claim to not have a Social Security number to sign an affidavit stating that they do not possess a Social Security number and are ineligible to receive one.

Starting on October 1, 2021, all licenses and identification cards issued in Idaho that are not compliant with the security and documentation requirements of the Real ID Act will need to have language stating that the card cannot be used for federal purposes. Since licenses for unauthorized immigrants would not be Real ID compliant, they would need to include the language at this time. Though non-Real ID compliant licenses do not need to be identified as such before 2021, numerous states made the policy decision at the creation of a program to include language on the card identifying it as non-Real ID compliant.

**Real ID goes
into effect on
October 1, 2021.**

8 states and the District of Columbia have a standalone credential for unauthorized immigrants.

A standalone driving credential would allow flexibility in program elements.

The neighboring states of Utah and Nevada offer a standalone driving credential to unauthorized immigrants. A standalone credential allows policymakers to change program characteristics, such as eligibility requirements, expiration of the card, and application fees.

The standalone driving credential could be eligible to those ages 15 years or older, as is the case for class D licenses. Policymakers could also set a higher age threshold.

States with a standalone driving credential often allow individuals other than unauthorized immigrants to apply.⁴ Illinois allows any immigrant regardless of immigration status to **get their Temporary Visitor's Driver's License.** Nevada and Vermont allow anyone, including citizens, to get a driving authorization card. Conversely, Connecticut, Delaware, and Utah only permit unauthorized immigrants to apply for their driving authorization card.

A standalone driving credential would allow policymakers to determine the purposes of the credential. Whereas a class D license is valid form of identification, a standalone driving credential could be prohibited for identification purposes. In Utah and Connecticut, a driving privilege card only grants an individual driving authority and cannot be used for any other purpose, such as purchasing alcohol or entering an aged-restricted bar.

4. If the Legislature were to permit individuals besides unauthorized immigrants to obtain a standalone driving credential, Idaho would be required by federal law to collect a Social Security number from those who have one.

A licensure program for unauthorized immigrants could not supersede federal law.

Federal restrictions limit the use of a driving credential for unauthorized immigrants in the following situations:

A credential cannot be Real ID compliant.

A credential cannot be used for federal purposes, such as to prove identification to the Transportation Security Administration or to enter a federal building.

An unauthorized immigrant may not use the credential to purchase a firearm, vote, or receive any benefit that an unauthorized immigrant is ineligible to receive, such as the Supplemental Nutrition Assistance Program, Medicaid, and Social Security Income.

Regulations for commercial driver's licenses are enforced by the Federal Motor Carrier Safety Administration (FMSCA). The FMSCA prohibits individuals without legal presence in the United States from obtaining a commercial driver's license. Any driving credential for unauthorized immigrants would not make an individual eligible to apply for a commercial driver's license.

Additionally, employing an unauthorized immigrant is against federal law regardless of whether the individual has state-level driving authority.

Federal law prohibits unauthorized immigrants from getting a commercial driver's license.

Policies for data sharing and program design may affect participation and access.

The design of a policy to allow unauthorized immigrants to drive affects the success of the program. Other states have documented challenges in three areas: (1) information sharing with federal authorities, (2) the documentation applicants must provide to prove identity, and (3) restrictions around applications.

Information sharing

A debate about sharing driver record information with federal immigration authorities has surfaced in most states that permit unauthorized immigrants to drive. On some level, every state **grants federal authorities access to driver's license data, though** states often place limits on the type of data and requirements for sharing information.

In January 2020 New York barred its department of motor vehicles from sharing any information with federal authorities after it passed a law permitting unauthorized immigrants to **apply for a driver's license. In response, the federal government** cut off access to Trusted Traveler Programs for New Yorkers. Trusted Traveler Programs allow US citizens to quickly enter the **United States after traveling abroad by relying on state driver's** license data for identifying individuals. The federal government gave back access in July 2020 after New York agreed to give federal authorities limited information for the programs. Idaho could see a similar response from the federal government if it were to cut off all federal access to DMV records.

Utah allows federal immigration authorities to search its division of motor vehicles records with a subpoena or case number. Advocates of immigration claim that individuals in Utah have been targeted for deportation after renewing their driving privilege card, and some advocacy groups have suggested caution in renewing a driving privilege card.

Federal documents obtained by Georgetown University showed that federal immigration authorities conducted more than 1,000 facial recognition searches of Utah driver record data in 2015—

2017. Federal immigration authorities also conducted facial recognition searches of driver record databases in Vermont and Washington. They have not publicly disclosed why or for what purpose they conducted these searches.

Required documentation for applicants

Identity fraud can be a concern when granting driving authority to unauthorized immigrants. Applicants may not have easily verifiable documents to prove identity, and as a result, states must rely on other documents to prove identity.

As of 2020, ITD requires foreign nationals to have a valid foreign **passport to apply for a driver's license. Because most** unauthorized immigrants in Idaho came to the United States before 2013, they are not likely to have a valid foreign passport. Other states can serve as a model for acceptable replacement documents.

Many states use consular identification cards to prove an **applicant's identity. Consular identification cards are issued by foreign consulates of an individual's home county. Consular** identification cards require an individual to show proof of identity and country of origin. A Mexican consular identification card, known as a *Matrícula Consular de Alta Seguridad*, requires applicants to prove Mexican nationality with either a birth certificate or passport and a second piece of Mexican identification that has their photo.

The ability to obtain a consular identification card depends on nationality. Mexican nationals can easily obtain a consular identification card in Idaho if they have the required documents. A Mexican consulate in Boise travels once a month across the state to service areas and rural communities and to issue consular identification cards.

For unauthorized immigrants from countries other than Mexico, getting a consular identification card may not be possible. Many countries do not offer a consular identification card. Countries that do offer consular identification cards, such as Guatemala, do not easily have a consulate in Idaho for unauthorized immigrants to access.

Idaho requires foreign nationals to have an unexpired foreign passport to apply for a driver's license.

A consular identification card or an ITIN are common identification alternatives to foreign passports.

Some states require applicants to have an Individual Taxpayer **Identification Number (ITIN) to apply for a state driver's license.**

The IRS issues ITINs to noncitizens, including unauthorized immigrants, who are not eligible for a Social Security number.⁵ To receive an ITIN, an unauthorized immigrant must show proof of foreign citizenship and identity through a combination of documents, such as a foreign passport, a foreign or domestic identification card, and a birth certificate. Requiring applicants to have an ITIN means that the IRS has previously confirmed an **individual's identity.**

However, requiring an ITIN may preclude some from being able to apply due to challenges obtaining an ITIN. Those without an income or employment most likely do not have an ITIN. ITINs that are not in use can expire. The National Taxpayer Advocate found that the IRS had a backlog of 120,000 ITIN applications in 2015 and a wait of up to 11 weeks for applications to be processed. Moreover, 31 percent of all applicants were denied an ITIN.

Before implementing their driving programs, California, Vermont, and Connecticut consulted with groups representing foreign nationals to best identify documents held by unauthorized populations. Having a wide range of acceptable documents, such as an ITIN, consular identification card, and foreign passport, would ease the process for unauthorized immigrants to apply for a driving credential without increasing the risk of identity fraud.

If policymakers were to decide to move forward with driving authority for unauthorized immigrants, they should consult with ITD to ensure that any new document accepted as identification for unauthorized immigrants works with and can be integrated **into ITD's one-driver, one-record system.** The one-driver, one-record system tracks individuals across DMV records to prevent multiple driving accounts under the same identification or false identities to circumvent license suspensions.

5. Noncitizens use ITINs to pay federal income tax.

Restrictions around applications

To ensure consistent service, some states have restricted applicants on where or how they get a license. Restrictions include designating certain department of motor vehicles or **driver's license offices as locations that serve unauthorized** immigrants or requiring applicants to reserve specific application appointments.

Requiring set application appointments and reducing the number of locations may help the implementation of a new driving credential program. Requiring set appointments can allow ITD to help applicants prepare documents before the appointment date and ensure applicants come with proper and valid material at the time of appointment.

Specializing certain DMVs or driver's license offices to handle unauthorized immigrant applicants can ensure that locations offering the service are better prepared for non-English speaking applicants and the processes of the driving credential program.

However, both restrictions may create challenges. As of 2020, **few counties have an option for scheduling a driver's license** appointment. Requiring other counties to create an appointment system may prove difficult and burdensome.

Restricting the number of DMVs and driver's license offices that issue licenses to unauthorized immigrants may inhibit the ability for applicants in some areas to obtain the new driving credential. If an individual lives too far away from a location that offers the credential, that individual may forgo getting a card.

3

Program impacts

We found a lack of conclusive evidence on the overall impacts of allowing unauthorized immigrants to drive. Information on driving programs for unauthorized immigrants is scarce, and what studies do exist often contradict one another. Many driving programs are too recent to have sufficient data to draw conclusions from.

Despite the limitations of available data, benefits exist for expanding access to driving authority in general. Benefits include increasing access to automobile insurance and ensuring that more drivers on the road understand road traffic laws and meet the physical requirements to obtain a license.

In this chapter, we will go over the areas of impact that a potential driving authorization card can have, including automobile insurance, road safety, criminal justice system, and employment for unauthorized immigrants.



Research is not conclusive that extending driving authority to unauthorized immigrants would affect automobile insurance.

Requesters of this evaluation asked us to look at how granting driving authority to unauthorized immigrants would affect automobile insurance in Idaho. There are two areas that could be affected: (1) the frequency of uninsured motorists and (2) the cost of insurance premiums. We found a lack of conclusive evidence that licensing unauthorized immigrants has a substantial effect in either area.

Frequency of uninsured drivers

When compared nationally, Idaho has a relatively low rate of uninsured drivers. According to a 2015 study by the Insurance Information Institute, 8.2 percent of Idaho motorists do not have automobile insurance. Idaho has the eleventh lowest rate of uninsured motorists nationally. As seen in exhibit 2, Idaho ranks similarly to neighboring states that both do and do not have a driving authorization program for unauthorized immigrants.

Exhibit 2

Idaho's uninsured motorist rate was lower than most neighboring states in 2015.

State	Percentage of uninsured motorists (%)	Licensed unauthorized immigrants in 2015
Idaho	8.2	No
Montana	9.9	No
Nevada	10.6	Yes
Oregon	12.7	No
Utah	8.2	Yes
Washington	17.4	Yes
Wyoming	7.8	No
National average	13	N/A

Source: Insurance Research Council and Insurance Information Institute.

8.2% of Idaho motorists are uninsured.

Most licensed unauthorized immigrants obtain insurance.

In states that permit unauthorized immigrants to drive, research is inconclusive about whether the programs have had any discernable effect on the percentage of uninsured motorists.

Studies show that most unauthorized immigrant drivers who own a vehicle obtain automobile insurance. As is the case with all drivers, research indicates that not all unauthorized immigrants who own a vehicle would get automobile insurance. If newly licensed unauthorized immigrants get insurance at a similar rate to all Idahoan drivers, then the uninsured driver rate in the state will not decrease.

Licensing unauthorized immigrants would grant access to automobile insurance to those who are driving now and are ineligible to obtain insurance because they lack a license. Because we do not know how many unauthorized immigrants are driving in Idaho, we do not know what affect allowing them to get a **license and insurance would have on Idaho's uninsured driving frequency.**

Additionally, since insurance is primarily tied to a vehicle, those who do not own a vehicle would not be likely to purchase insurance.

Determining the effect of licensing unauthorized immigrants on uninsured motorist rates in Idaho may prove to be difficult because of a recent law change. Starting in 2020, Idaho Code requires all registered vehicles to have documented proof of insurance for the vehicle registration to remain active. Vehicle registration can be suspended on vehicles which do not have insurance for two consecutive months. This change in law will likely affect the uninsured motorist rate in Idaho.

Overall automobile insurance costs

Studies conflict on the effects that licensing unauthorized immigrants can have on insurance premiums. Some studies have concluded that licensing unauthorized immigrants can lower insurance premiums, while others have seen no change in insurance premiums after driving authority is extended. No studies have shown an increase in insurance premiums.

In 2013–2017, nine states and the District of Columbia introduced a driving program for unauthorized immigrants.

According to the National Association of Insurance Commissioners, none of those states saw a decrease in average annual automobile insurance premiums after implementing their program. As seen in exhibit 3, year over year increases in insurance premiums in states introducing a driving authorization program aligned with national changes to average annual automobile insurance premiums.

Exhibit 3

Changes in automobile insurance premiums in 2013–2017 were similar in all states regardless of whether they licensed unauthorized immigrants to drive.

	2013	2017	
	Average insurance premium (\$)	Average insurance premium (\$)	Percentage increase (%)
States with a driving authorization program	867.12	1,018.34	17
States without a driving authorization program	791.75	928.82	17
Idaho	560.86	678.57	21

Source: Insurance Research Council and Insurance Information Institute.

Idaho already has one of the lowest average cost for automobile insurance premiums nationally. In 2017 the average annual premium in Idaho was \$678.57, with an average liability premium of \$403.37. Idaho had the fourth lowest average annual premium for automobile insurance in the nation. None of the three states with less expensive average automobile insurance, North Dakota, Maine, and Iowa, permit unauthorized immigrants to drive.

States differ in their regulations on automobile insurance, such as the mandatory insurance coverage drivers must carry and the variables that can be used to determine insurance premiums. Regulations influence the cost of insurance, making comparisons among states difficult.

Idaho has the fourth lowest average premium for automobile insurance.

The projected cost of insurance for unauthorized immigrants cannot be calculated.

Cost of insurance for unauthorized immigrants

Insurance agencies rely on an individual's driving history to determine the risk of insuring. Access to an unauthorized immigrant's driving history is likely not available, placing them in the high-risk pool of drivers.

Insurance premiums are higher for individuals deemed high-risk, creating a potential barrier for unauthorized immigrants trying to obtain automobile insurance. Unauthorized immigrants could see their risk rating and premium costs decrease as they build up a safe driving record.

The actual cost of insurance premiums for unauthorized immigrants cannot be calculated because of the variables involved. Besides driving history, premiums can be influenced by factors such as education level, coverage type, where a driver lives, and the make and year of the vehicle insured.

Idaho's liability insurance law

Idaho Code mandates that all vehicles operating in the state must carry liability insurance to cover damages incurred to other property or individuals. At a minimum, liability insurance must cover \$25,000 for injury to any one person and up to \$50,000 if two or more individuals are injured. Additionally, liability must cover a minimum of \$15,000 to any damaged property. Automobile insurance is primarily tied to the vehicle and not to the individual.



Allowing unauthorized immigrants to drive may change the severity and type of automobile accidents.

Studies on road safety and the effects of licensing unauthorized immigrants have not shown reductions in the number of automobile accidents. However, evidence suggests that licensing unauthorized immigrants can affect road safety. Road safety can be affected primarily in two ways: (1) reducing the severity of automobile accidents involving unauthorized immigrants and (2) lowering the number of hit-and-run accidents. Detailed information on automobile accident data and costs in Idaho are in appendix E.

Accidents involving unlicensed drivers

In 2015–2019, 1,001 automobile accidents in Idaho involved an unlicensed driver, representing 0.3 percent of all automobile accidents over that timeframe. These accidents include both when the unlicensed driver was and was not at fault. Data are not available for the number of unlicensed driver accidents that involve unauthorized immigrants.

As seen in exhibit 4, about 1 percent of accidents involving an unlicensed driver ended in a fatality, compared with 0.4 percent of all accidents that ended in a fatality.

The increased fatality risk for accidents involving unlicensed drivers is echoed in studies done by the National Highway Traffic Safety Administration and AAA. These studies found that a significant portion of fatal automobile accidents nationally involve unlicensed drivers. A 2013 study by the California Department of Motor Vehicles found that unlicensed drivers were three times as likely as licensed drivers to be involved in a fatal car accident.

In addition to a higher fatality rate, accidents involving unlicensed drivers in Idaho are more likely to result in an injury than accidents involving licensed drivers. In 2015–2019, 55 percent of unlicensed driver accidents ended in an injury, while 21 percent of all accidents resulted in an injury.

1,001
automobile
accidents in
Idaho involved an
unlicensed driver
in 2015–2017.

Accidents involving an unlicensed driver are 3 times as deadly as accidents involving all licensed drivers.

Exhibit 4

In 2015–2019 automobile accidents involving unlicensed drivers were more likely to result in injuries than accidents involving licensed drivers.

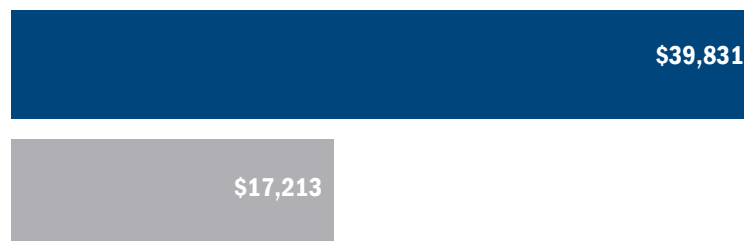
Accident severity	Unlicensed driver accidents (%)	All other accidents (%)
No injury	45.25	78.77
Possible injury	29.27	12.73
Suspected minor injury	16.78	6.42
Suspected serious injury	7.69	1.70
Fatality	1.00	0.38

Source: ITD data

Accidents involving unlicensed drivers come with a higher financial cost. As shown in exhibit 5, in 2015–2019 the average unlicensed driver accident in Idaho cost \$39,831 compared with \$17,213 for a licensed driver automobile accident. All accidents involving unlicensed drivers cost an estimated \$39.9 million in 2015–2019.

Exhibit 5

The average accident involving an unlicensed driver costs more than twice as much as an accident involving all licensed drivers.



Source: ITD and NHTSA data.

Studies in states that allow unauthorized immigrants to drive have shown that the severity of accidents involving licensed unauthorized immigrants align with accidents involving other licensed drivers. Studies have also shown that the safety risk of unlicensed, unauthorized immigrants on the road may align with higher accident severity of unlicensed drivers in general. Licensing unauthorized immigrants could help mitigate risk by ensuring the driver is qualified to drive and understands traffic laws.

Hit-and-run accidents

In 2015–2019, 7,923 hit-and-run accidents occurred in Idaho. As seen in exhibit 6, the injury and severity rates for hit-and-run accidents in 2015–2019 were similar to all accident types.

Exhibit 6

In 2015–2019, hit-and-run accidents had a similar rate of injuries as all automobile accidents.

Accident severity	Hit-and-run accidents (%)	All other accidents (%)
No injury	75.26	78.75
Possible injury	15.31	12.72
Suspected minor injury	7.69	6.43
Suspected serious injury	1.58	1.72
Fatality	0.16	0.38

Source: ITD data.

Hit-and-run accidents cost an estimated \$113.5 million in 2015–2019, at an average cost of \$14,331 per accident. Around 41 percent of drivers involved in a hit-and-run accident were not identified. The estimated cost for hit-and-run accidents where the driver was not identified cost \$46.3 million in 2015–2019. As seen in exhibit 7, the innocent driver or their insurance pays for most of the costs incurred by hit-and-run accidents when an unidentified driver is involved. The remaining costs are paid by the government or other parties.

7,923
hit-and-run
accidents
occurred in Idaho
in 2015–2019.

41%
of driver's
involved in a
hit-and-run
accident are not
identified.

Unlicensed drivers are **9.5** times as likely to leave the scene of an accident.

Exhibit 7

Innocent parties or their private insurance paid most of the cost in hit-and-run accidents where the driver is not identified, while government and other sources paid a smaller portion.

\$11,979,727

\$24,506,037

\$9,851,875

Source: ITD and NHTSA data.

We found evidence suggesting that by licensing unauthorized immigrants, the number of hit-and-run accidents can be reduced. California and Connecticut have recorded a decrease in the frequency of hit-and-run accidents after allowing unauthorized immigrants to drive. Data on changes in hit-and-run frequencies do not exist for the remaining states.

Being an unlicensed driver is a contributing factor for hit-and-run accidents. A study by AAA found that unlicensed drivers are 9.5 times more likely to leave the scene of a fatal accident than licensed drivers. Besides punishment for driving unlicensed, unauthorized immigrants may fear additional punishment such as deportation, which increases the likelihood they will leave the accident scene.

Although allowing unauthorized immigrants to obtain driver's licenses and to secure insurance could have the effect of reducing hit-and-runs, the overall magnitude of the effect may be small because of the low frequency of known hit-and-run accidents involving an unlicensed driver. Of the 4,747 drivers identified in an Idaho hit-and-run accident in 2015–2019, only 90 were unlicensed. Data do not exist for how many of those were unauthorized immigrants.

Unauthorized immigrants holding licenses likely would not significantly change criminal justice system.

Requesters of the evaluation asked us to examine how granting driving authority to unauthorized immigrants would affect criminal justice systems in the state, such as court time and resources spent on addressing unlicensed unauthorized immigrants. Because of how federal immigration authorities prioritize unauthorized immigrants and recent changes in Idaho Code, we found that licensing unauthorized immigrants would not likely have a significant impact on the criminal justice system.

Federal immigration authorities are responsible for identifying and deporting unauthorized immigrants. Neither federal nor state law requires local law enforcement officials who come into contact with a suspected unauthorized immigrant to notify federal immigration authorities.

In fiscal year 2019, 697 unauthorized immigrants were detained in Idaho by US Immigration and Customs Enforcement (ICE). Of those detained, 600 were held in either a county or state facility on an immigration 247 (I-247) detainer.⁶ Under an I-247 **detainer, Idaho's criminal justice facilities must hold individuals** for up to 48 hours until they are picked up by ICE authorities.

A state or county facility holding an unauthorized immigrant for 48 hours will incur costs, though some expenses are reimbursed by the federal government. Evidence suggests that licensing unauthorized immigrants would not likely lower the number of ICE detainees in Idaho.

Under Department of Homeland Security guidelines, unauthorized immigrants charged with a criminal offense are prioritized for detainment by ICE. Lesser noncriminal offenses, such as civil public offenses, are not formally prioritized by federal immigration authorities.

Federal immigration authorities are responsible for identifying unauthorized immigrants.

6. ICE issues an I-247 detainer to federal, state, local, and tribal law enforcement agencies. It notifies the agency of ICE's intent to assume custody of an unauthorized immigrant who is under agency custody.

In 2018 Idaho Code was amended to reduce the penalty of driving without a license.

Two processes in Idaho lessen the chance that an individual will be prioritized for detainment after driving without privileges:

In 2018 Idaho Code § 49-301 was amended to change the penalty for driving without privileges. Before the law changed, individuals caught driving without privileges were subject to a misdemeanor charge and a minimum of two days in jail on first offense. Under the new law, individuals caught driving without a license are subject to an infraction and fine on the first two offenses. An individual caught driving without privileges three or more times in a five-year span is subject to a misdemeanor and up to six months in jail.

A motor vehicle infraction citation, such as driving without privileges, is a civil public offense and not a criminal offense in Idaho. An individual cannot be arrested for a motor vehicle infraction and will not face court time if they pay the fixed penalty.

The number of immigration detainees in Idaho only decreased slightly after penalties for driving without privileges were reduced in 2018. While ICE does not publicly disclose the reason an individual is detained, the similar number of detainees after 2018 could indicate that driving without privileges was not a large contributing factor to detainees.

The annual fluctuations of detainees in Idaho has mirrored that of national trends since 2003, indicating that national not state policy likely drives changes in yearly detainees.

Economic outcomes for unauthorized immigrants could improve after obtaining driving authority.

Private vehicles in Idaho play an important role in getting to and from work. According to the US Census Bureau's American Community Survey data, 88.3 percent of Idaho workers rely on a private vehicle to commute to work. Studies have shown that **access to a driver's license and vehicle can improve economic outcomes** for individuals and this holds true for unauthorized immigrants.

A 2007 focus group study by the University of California at Davis found that unlicensed immigrants have difficulties commuting to work due to inadequacies of other means of transportation. In many cases, public transportation is either not available or is unreliable. Asking someone for a ride forces an employee to **adhere to someone else's schedule. Transportation during off hours**, such as late at night, can be difficult to find.

Unauthorized immigrants with driving authorization become less likely to rely on carpooling or public transportation and more likely to take their own vehicle to work. The change in transportation increases job accessibility for unauthorized immigrants, allowing them to seek employment farther from home or take jobs with irregular hours.

A 2020 study found a 1 percentage point increase in employment for unauthorized immigrants after having driving authorization. Employment effects are more pronounced in rural communities where employment increases by 2.4 percentage points. The IZA Institute of Labor, an international network of labor economics in Germany, found that female unauthorized immigrant employment increases by 4.2 percentage points after access to driving authorization. Moreover, studies have shown unauthorized immigrants increased their weekly hours worked after driving authorization became available.

88.3%
of Idaho workers
commute by
private vehicle.

**With access to
driving
authorization,
employment for
unauthorized
immigrants
increases by
1–2.4
percentage
points.**

Beyond increasing employment, driving authorization can change the type of work done for those already employed. Although unauthorized immigrants would not be eligible for a **commercial driver's license**, **Idaho Code would allow** unauthorized immigrants with licenses to drive commercial vehicles on a limited basis. Idaho Code § 49-302 exempts a **commercial driver's license for farmers or their employees who** transport agriculture products, farm machinery, and farm supplies within 150 miles of their farm. Unauthorized immigrants are a large portion of Idaho agricultural employment and giving them access to driving authority can change the nature of the work they perform on farms.



Program costs and revenue



We tested two program designs to determine the costs of operation and revenue generated from granting driving authority to unauthorized immigrants.

The first program design would allow unauthorized immigrants **to get a standard class D driver's license. The class D design uses** systems already in place to determine program aspects of the license such as fee structure, length of validity, and eligibility requirements.

The second design is a standalone driving authorization card. The standalone program has its own programmatic elements separate from a standard class D license. For purposes of this evaluation, we set validity length for the driving authorization card at one year, the application fee at \$25, and age requirements at 18 or older.

Overall, we found that costs for issuing driving credentials to unauthorized immigrants would be offset by program revenue regardless of program design. When accounting for revenue sources outside of testing and application fees, Idaho could see a slight increase in revenue. Detailed information about the program model assumptions and results are in appendix F.

An estimated
11,700
 licenses would be
 issued to
 unauthorized
 immigrants in the
 first year.

Allowing unauthorized immigrants to get a class D license would have a lower transaction burden on DMVs than creating a new credential.

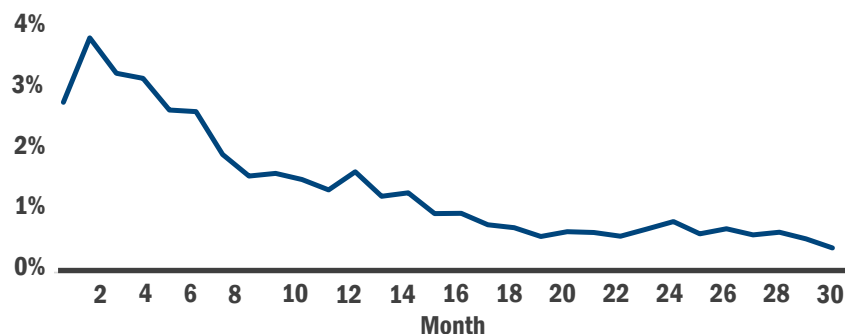
We estimated that 17,600 class D licenses would be issued to unauthorized immigrants in Idaho within the first 30 months of a driving authorization program. Most licenses, 11,700 would be issued within the first year of the program with new applicants trailing off thereafter.

In 2019 Idaho issued 418,500 driver's licenses, motorcycle endorsements, instruction permits, and identification cards, along with 81,400 replacement licenses. An additional 11,700 licenses would be a 2.3 percent increase in annual cards issued in the first year of a program.

As seen in exhibit 8, the share of unauthorized immigrant licenses to total DMV transactions would drop after the first year of the program. By year two, unauthorized immigrant licenses would comprise 0.8 percent of all DMV transactions statewide, and by year three, these licenses would constitute 0.6 percent of all DMV transactions.⁷

Exhibit 8

Under a class D program the percentage of credentials issued by DMVs to unauthorized immigrants would decrease over time.



Source: Office of Performance Evaluations' model and ITD data.

7. Because of year-over-year population growth, a driving authorization card program would likely represent a lower share of DMV transactions.

Program costs

Costs for administering licenses are split between ITD and counties, who are tasked with operating DMVs. The cost for counties to issue licenses vary from county to county.

Using data provided by the Idaho Sheriff's Association, we estimated that counties spent an average of \$12.18 per license issued in 2018. Over the first 30 months of a class D program, counties would spend an estimated \$214,000 for the cost of issuing licenses to unauthorized immigrants.

ITD spent an estimated \$14.16 to issue a license in fiscal year 2019. This cost includes direct costs of personnel, operating, and capital, as well as indirect costs such as administrative support, information services, and financial services.

At \$14.16 per license, ITD would incur increased costs of \$249,000 to issue 17,600 licenses to unauthorized immigrants over the first 30 months of the program.

Initial start-up costs for allowing unauthorized immigrants to obtain a class D license would be minimal since the only change would be regulatory, and a new program would not need to be created. ITD has systems in place to educate county DMV employees on any changes to driver's license issuance, reducing the need for additional spending on county training.

Revenue

After 30 months, licenses for unauthorized immigrants would generate approximately \$796,000 in application and testing fees, of which about \$437,000 would go toward sources that fund driver's license administration. Under distribution structures for driver's license fees, the state would receive approximately \$612,000 in revenue over the program's first 30 months, and counties would receive the remaining \$184,000.

Allowing unauthorized immigrants to get a class D driver's license would generate approximately \$333,000 in net revenue over the first 30 months of a program. When including only revenue that goes back to the funding sources for driver's licenses administration, the program would have a deficit of about \$26,000.

ITD would incur increased costs of \$249,000 over 30 months to issue licenses to unauthorized immigrants.

Over the first 30 months, licenses for unauthorized immigrants would bring in \$796,000 in revenue.

**ITD would issue
 38,100
 driving
 authorization
 cards over the
 first 30 months of
 the program.**

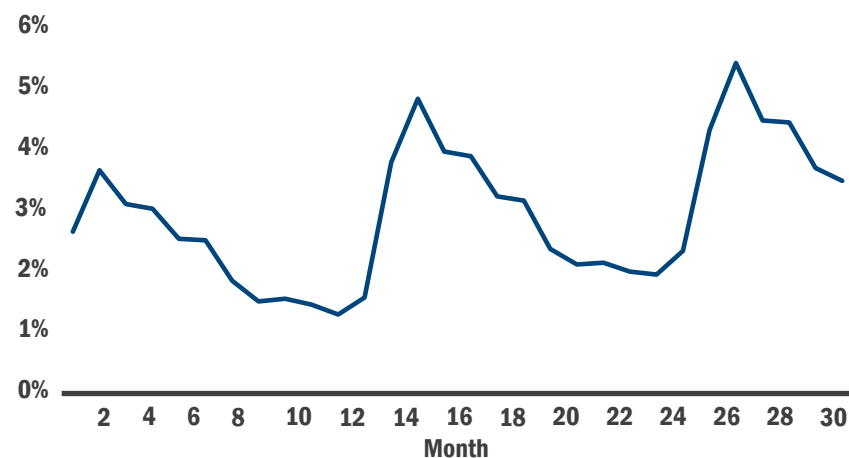
A new driving authorization card would increase revenue and costs.

Under a driving authorization card, individuals would need to renew their license after a year. As such, the total number of licenses issued within the first 30 months of a one-year driving authorization card program is higher than a four-year license program. In the first year of the program, an estimated 11,300 credentials would be issued. The number of licenses issued would increase in year two to 15,400 credentials. By the end of the first 30 months, the program would issue an estimated 38,100 credentials.

The share of DMV transactions from unauthorized immigrant credentials would be 2.2 percent in year one. The share in year two would be 2.9 percent, and year three would be 3.2 percent. As shown in exhibit 9, the proportional share of unauthorized immigrant credentials to total DMV transactions would increase after the first year of the program, and it would hold after year three with potential to decrease due to general population growth.

Exhibit 9

Annual renewals for driving authorization cards would increase their share of DMV transactions over the first 30 months.



Source: Office of Performance Evaluations' model and ITD data.

Program costs

Using the same cost structure as class D licenses, we estimated that counties and ITD would spend \$464,000 and \$540,000 respectively, to issue driving authorization cards over the first 30 months of a program.

Additionally, ITD estimated that development start-up costs for a driving authorization card program would be \$72,000. Exhibit 10 shows that even with the additional start-up costs for a driving authorization card, total program revenue would exceed program costs for both counties and ITD.

Exhibit 10

Total revenue would exceed costs over the first 30 months after creating a new driving authorization card.



Revenue

Total revenue for the first 30 months of a one-year driving authorization card program would be \$1.2 million. Policymakers would need to determine the fee distribution for a standalone driving authorization card. Depending on the fee distribution, revenue generated by a driving authorization program could cover the expected start-up and issuance costs for the state and counties.

**It would cost ITD
\$540,000
over the first 30
months of the
program to issue
driving
authorization
cards.**

**Driving
authorization
cards would
generate
\$1.2 million
in revenue over
the first 30
months.**

**An estimated
6,200
vehicles would be
registered by
unauthorized
immigrants.**

Idaho could receive additional revenue through automobile registration and title fees.

The New York Fiscal Policy Institute estimates about 36 percent of unauthorized immigrants who obtain driving authority will also own a vehicle. Using the lower estimate of 16,900 applicants, we estimated that 6,200 additional individual vehicles would be registered within the first 30 months of the program.⁸

Vehicles must be registered annually in Idaho. Vehicles registered in year one would also need to be registered in year two and three. In total, Idaho would see 14,000 additional vehicle registrations over the first 30 months of a driving authorization program.

The cost to register a standard vehicle varies by the age of the vehicle, ranging \$45–\$69. In 2015–2018 the average cost to register a vehicle was \$49.90.

At \$49.90 per vehicle registration, Idaho could expect to see \$696,000 in revenue from vehicle registrations over the first 30 months of a driving authorization program. All revenue from vehicle registration goes toward the highway distribution fund.

A new owner of a vehicle must pay a car title fee of \$14. The car title fee is a one-time cost and does not repeat annually. As such, Idaho would receive revenue of about \$87,000 in car title fees.

Additional funds would be seen through vehicle sales taxes and license plates fees. These funds vary and are not included in our analysis.

8. Idaho does not require proof of residency or lawful presence to register or title a vehicle, and as such, unauthorized immigrants may have already registered vehicles in Idaho. Our estimate of 6,200 additional vehicles does not account for these vehicles.

Request for evaluation



Jim Guthrie

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COMMITTEES

Chairman - Agricultural Affairs
Commerce & Human Resources
Resources & Environment

March 5, 2020

Joint Legislative Oversight Committee
Idaho State Capitol
700 W. Jefferson St.
Boise, Idaho 83702

ATTN: Rakesh Mohan, Director
*via Email: rmohan@ope.idaho.gov
and via Hand Delivery*

RE: Request for Evaluation
Driver Verification Cards

Dear Co-Chairs Harris and Rubel, and Members of the Committee:

Motorized transportation of people and products is an essential part of Idaho's economy and way-of-life. Driver education, driver skills verification and mandatory vehicle insurance are ways that we enhance the safety of our public highways. A licensing program for driver's also helps law enforcement as they patrol the highways and interact with people. Increasingly in Idaho, as in the rest of the Nation, we are faced with a significant population of residents not authorized to live or work in the United States. Yet, these people undoubtedly travel and move about on Idaho's highways and in our communities.

As part of the Legislature's responsibility to promote the public health and safety of all Idaho residents, we are interested in learning more about the significance of this issue, and the extent to which adopting a driver authorization program for undocumented residents would promote public health and safety. We believe data from other states may aid and assist in this endeavor to inform the Legislature as it crafts public policy. Fifteen states and the District of Columbia have adopted a system to authorize undocumented residents to operate a vehicle. We appreciate the opportunity to request a study to be done by the Office of Performance Evaluation regarding the issue of "**Driving Verification Cards**". In support of this request we offer the following remarks.

State the Problem. Under present Idaho law, an undocumented resident cannot obtain a driver's license, own or register a motor vehicle, or get the vehicle insured. This creates a problem inasmuch as Federal immigration law and policy, and poor enforcement thereof, has allowed for the influx of undocumented residents into Idaho and, for that matter, the United States generally. As Congress remains unable or unwilling to enact meaningful Federal immigration reform, we cannot deny that

undocumented residents are assimilating into our communities, undertaking work, raising families, engaging in commerce, and driving on our roads. Undocumented residents are a critical part of the workforce in Idaho. However, their undeniable use of our highways is occurring without competency testing, legal authorization, and presumably without driver or vehicle insurance. This creates significant risks to the public health and safety of Idaho's lawful residents. Because Idaho has no authority to enforce Federal immigration law, we must look to other creative solutions to promote the safety of Idaho's roads.

Describe the Magnitude of the Problem. It is difficult to obtain accurate data on the undocumented resident population, for obvious reasons. A study by the Migration Policy Institute suggests Idaho has 30,000 undocumented residents, of which 27,000 are over the age of 18 and all but 2,000 of those adults are employed. These individuals tend to be employed in agriculture, followed by service industries (e.g., hospitality, construction, food and beverage) and then manufacturing (e.g., food processing). This means we may have as much as 25,000 individuals commuting to work each day without driver education, skills testing, legal authorization or insurance. Those not working, we can expect, are still traveling as part of their family life and to engage in commerce. We believe currently available data presents a conservative number of undocumented residents in Idaho, and we expect through in-depth study and upcoming Census data the numbers may be much higher, making the problem of even greater concern.

Desired Information. We believe a detailed, and in-depth, OPE study can inform the Legislature and educate legislators as they engage in making important public policy for highway safety on the following topics. With so many other jurisdictions having a driver authorization system for undocumented residents, there should be a trove of data from which to draw.

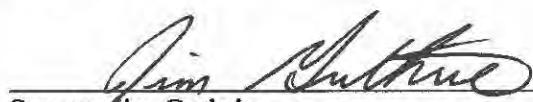
1. The size of Idaho undocumented resident community, and the impact of that community on Idaho's labor force, GDP and expenditure of public funds.
2. Expected participation in an Idaho Driver Verification Card for undocumented residents.
3. Expected road safety impacts of an Idaho Driver Verification Card for undocumented residents (e.g., hit-and-run accidents, total road accidents, eluding officers, driver identification or identity fraud or license fraud, driving infractions, alcohol offenses).
4. Expected insurance impacts of an Idaho Driver Verification Card for undocumented residents (e.g., number of uninsured drivers, insurance rates or costs, compensable accidents and injuries, use of indigent funds or Medicaid for auto accident injuries).
5. Expected costs of administration and potential state revenue from an Idaho Driver Verification Card for undocumented residents.
6. Expected impacts on the criminal justice system of an Idaho Driver Verification Card for undocumented residents (e.g., prosecutor and public defender time, jail processing, housing and costs, court time and resources).
7. More generally, we are interested in the experiences of other jurisdictions. Any data on hurdles they encountered as they adopted driver authorization programs and how they were able to mitigate concerns. In the spirit of fairness, we want to know what the downfalls might be or if any states have had buyer's remorse.

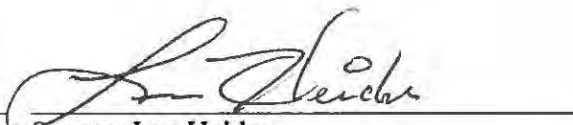
Anticipated Use of the OPE Report. The requested OPE report would be used to educate and inform Idaho's policymakers at the State, county and city levels, and for their anticipated use in development of legislation. Ultimately, and depending upon the information developed by OPE, the intent would be to place in Code an opportunity for Idaho to issue "Driving Verification Cards" to help


mitigate the previously mentioned challenges. Short of that, the above would be extremely valuable information to base other policy decision-making on relative to any immigration reform efforts that could be forthcoming. In addition, the information could help all sectors of society from the law enforcement community, to business and industry, to our citizens.

Conclusion. We believe this is an issue that is long overdue to be addressed. The reality is that we have thousands of undocumented residents in Idaho and, as such, we have a road safety and compromised workforce issue. Experience shows that the detail provided in studies done by OPE is invaluable and beyond the scope of what we, as part-time legislators, can accomplish. We would respectfully ask that you give our request your most diligent consideration and would look forward to assisting in any way we can if our request is approved and a study is conducted.


Respectfully submitted,



Senator Jim Guthrie
Chair, Senate Agricultural Affairs Comm


Senator Lee Heider
Chair, Senate Resources & Enviro. Comm.



Senator Cherie Buckner-Webb
Senate Asst. Minority Leader


Senator Michelle Stennett
Senate Majority Leader


Senator Mark Harris
Vice Chair, Senate State Affairs Comm.


Senator Jim L. Patrick
Chair, Senate Commerce & Human Resources Comm.

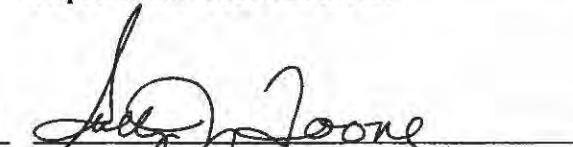

Senator Grant Burgoyne


Representative Lance W. Clow
Chair, House Education Comm.

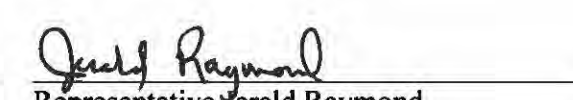

Representative Clark Kauffman


Representative Kevin Andrus


Representative Elaine Smith


Representative Sally Toone


Representative Laurie Lickley


Representative Jerald Raymond

Evaluation scope



We will answer the following questions:

What are the demographics of unauthorized immigrants who live in the state?

How would a driving authority program affect various aspects of the state, such as road safety, automobile insurance, and the criminal justice system?

What are program design options for a driving authority program and how would different designs affect participation and outcomes of the program?

How much would a program cost to operate, and how much revenue could the program expect to bring in?

Additionally, we will look at the experiences of other states with similar programs and examine implementation challenges, whether programs have been successful in promoting participation, and whether programs have had any discernible influence in road safety, automobile insurance, and the criminal justice system.



Methodology

This evaluation was designed to look at affects other states have experienced after granting driving authority to unauthorized immigrants and to look at how a program would potentially impact Idaho.

The evaluation approach relied heavily on data and studies of programs in other states to examine effects of granting driving authority to unauthorized immigrants. In addition, we **interviewed key stakeholders for driver's license administration** within Idaho.

Interviews

We interviewed the following stakeholders about the impacts of granting driving authority to unauthorized immigrants:

- Legislators

- Staff at the Idaho Department of Transportation

- Staff at the Idaho Department of Insurance

- Staff at the Idaho Commission on Hispanic Affairs

- Staff at the Idaho Sheriff's Association**

- Staff at the Idaho Association of Counties

- Staff at the National Conference of State Legislatures

- Staff at the Idaho Dairymen Association

- Legislative staff for the Oregon Department of Transportation

Literature review

Several state and national organizations have produced studies, reports, and recommendations about the impacts of granting driving authority to unauthorized immigrants. We reviewed these studies to determine the impacts that Idaho may face after granting driving authority to unauthorized immigrants. Exhibit 11 is a selected list of those works and their findings.

Exhibit 11

Literature review

Topic	Studies with positive findings	Studies with neutral or negative findings
Road safety	<p>A 2017 study by Stanford University found that the frequency of hit-and-run accidents decreased by 10 percent after unauthorized immigrants were permitted to drive in California. Licensing unauthorized immigrants did not lead to a decrease in the total number of automobile accidents in the state, but accidents involving unauthorized immigrants were no more severe than other accidents.</p> <p>A 2016 study by Roger Williams University found that states with a higher percentage of unauthorized immigrant residents have a lower frequency of automobile accident fatalities. Moreover, states that allow unauthorized immigrants to obtain a license have a further reduction in fatal automobile accidents.</p> <p>A 2016 study by The Commonwealth Institute found that states which have allowed unauthorized immigrants to drive have experienced a reduction in fatal automobile accidents by 30 percent since 1994, while all other states experienced a 20 percent decrease in fatal automobile accidents.</p> <p>A 2019 report by the New England Center for Investigating Reporting found a 9 percent decrease in hit-and-run accidents in Connecticut after allowing unauthorized immigrants to drive. Hit-and-runs decreased by 15 percent in the 10 cities with the highest concentration of licenses issued to unauthorized immigrants.</p>	<p>A 2018 study by the Institute for Social Research found that there was no significant change in the number of automobile accidents or hit-and-run accidents in California after unauthorized immigrants were permitted to drive in 2016.</p> <p>In 2020, the Center for Growth and Opportunity at Utah State University released a study which showed an increase in automobile accident exposure in California counties with a higher number of licensed unauthorized immigrants. The increased accident exposures were no more likely to result in an injury than the average accident exposure in the state.</p>

continued

Exhibit 11

Literature review

Topic	Studies with positive findings	Studies with neutral or negative findings
Automobile insurance uptake	A 2008 study by the Utah Office of the Legislative Auditor General found that most unauthorized immigrants with a driving authorization card held automobile insurance, though at a slightly lower rate than those with a regular driver's license. The study reported that 76% of unauthorized immigrants with a driving authorization card in Utah had automobile insurance, compared with 82% of general driver's license holders.	A 2011 study in the <i>Journal of Insurance Regulation</i> found an increase in uninsured motorists in states that permitted unauthorized immigrants to drive. The study reported that for every 1 percentage point increase in unauthorized population in a state that allows unauthorized immigrants to drive, there was a corresponding 2 percentage point increase in the number of uninsured motorists.
	The Institute of Social Research found that in California, counties with a higher percentage of unauthorized immigrants saw a lower yearly increase of uninsured motorists than counties with a lower unauthorized immigrant population. This suggests that unauthorized immigrants are obtaining automobile insurance at potentially a higher rate than the general public. The study did not find any correlation between the unauthorized population in a county and the number of accidents involving uninsured motorists.	H. Lueders and M. Mumper found that licensing unauthorized immigrants in California had no discernible impact on the uptake rate of automobile insurance in the state. Additionally, the number of automobile insurance bodily injury claims did not increase after allowing unauthorized immigrants to obtain a driver's license. This suggests that the newly licensed drivers are unlikely to be inexperienced drivers and may have previously been driving without a license.
	The Center for Growth and Opportunity researchers found a 1 percent increase in liability insurance coverage that is associated with allowing unauthorized immigrants the ability to drive. Other types of insurance coverage, such as collision and comprehensive coverage, saw no statistically significant increase in coverage from granting unauthorized immigrants driving privileges.	Roger Williams University found that states with higher percentages of their populations comprised of unauthorized immigrants have a higher rate of uninsured drivers. This correlation was statistically significant at the 0.05 level for states that restrict unauthorized immigrants but was not statistically significant for states that allow unauthorized immigrants to drive.
	A 2016 press release by the California Department of Insurance claimed that California experienced an unexpected additional increase of 200,000 insured automobiles the year after allowing unauthorized immigrants to obtain a license. However, they were not able to definitively tie the increase in insured vehicles directly to unauthorized immigrants.	

continued

Exhibit 11

Literature review

Topic	Studies with positive findings	Studies with neutral or negative findings
Automobile insurance cost	<p>A 2015 study by M. Cáceres and K. P. Jameson found that restricting unauthorized immigrants from obtaining legal driving documents raised the annual cost of automobile insurance by \$17.22 per year in 2009 dollars. The study found that states with lower counts of unauthorized immigrants see the largest savings in automobile insurance because they introduced fewer drivers to high-risk automobile insurance pools. However, this study focused on automobile insurance costs in 1990–2008 and does not incorporate data from states that have more recently developed driving authorization programs.</p> <p>Roger Williams University found states that allow unauthorized immigrants to drive have a slightly lower average cost of automobile insurance than states that restrict access to driving privileges. Automobile insurance costs increase as the share of unauthorized immigrants to total population increases in a state.</p>	<p>A 2020 study by H. Lueders of the Stanford Policy Lab and M. Mumper of the California Department of Insurance found licensing unauthorized immigrants had no effect on automobile insurance costs in California. In the study, researchers found a similar increase in automobile insurance premiums in counties with high, medium, and low numbers of licensed unauthorized immigrants, suggesting that licensing unauthorized immigrants was not the cause of the increase. Additionally, the increase in insurance premiums tracked across inexperienced and experienced drivers.</p> <p>The 2020 study released by the Center for Growth and Opportunity did not find any significant impact on insurance premium costs in states after permitting unauthorized immigrants to drive.</p>

continued

Exhibit 11

Literature review

Topic	Studies with positive findings	Studies with neutral or negative findings
Employment	<p>A 2020 study by H. Cho found a 1 percentage point increase in employment rate for unauthorized immigrants after obtaining driving authority. In rural areas, employment is increased by 2.4 percentage points. The probability an unauthorized immigrant commutes by car increases by 3 percentage points after obtaining driving authority.</p> <p>In 2018, the IZA Institute of Labor Economics found that granting driving privileges to unauthorized immigrants increases work propensity for unauthorized immigrant women by 4.2 percentage points, bringing them in line with their male counterparts. Additionally, their weekly hours worked increased by 4%. The effects on male employment were not as significant, though the unauthorized men in their sample were already likely to be working full time, making their labor supply less elastic. Male workers were 4% less likely to carpool after obtaining driving authority.</p> <p>A 2019 study by H. Lueders found that unauthorized immigrants in California with driving authority work up to 65 more hours per year. The increase in hours worked is likely a result of allowing individuals to take their own transportation to work as opposed to relying on public transportation. However, driving authority did not change the type of industry that unauthorized immigrants are employed in or</p>	

Requirements of other states



State and credential	Application requirements	Cost	Years of validity	Program start year
California, Driver's license	Eligibility requirements are the same as a standard California driver's license. Applicant must sign an affidavit that they are ineligible to receive a Social Security number.	\$37	5 yrs.	2015
Colorado, Driver's license	Applicant must provide proof of residence in Colorado with either the previous year's tax filing or evidence of residency for the previous 24 months. The applicant must have an ITIN or letter from the IRS. Applicant must sign an affidavit that they will apply to become lawfully present as soon as they are eligible.	\$33 for license	3 yrs.	2014
Connecticut, Drive only license	License is for undocumented immigrants. Applicant must be a resident of Connecticut for at least 90 days. Applicant must sign an affidavit that they have filed or will file an application to legalize immigration status. Applicant must not have been convicted of a felony.	\$40 testing fee \$19 learner permit fee \$72 license fee	3.5–5 yrs. randomly generated by software	2015
Delaware, Driving privilege card	Applicant must be a noncitizen with no valid legal presence. Must prove they have filed taxes in Delaware for at least 2 years. Applicant must submit fingerprints before applying.	\$20 for license \$52 for mandatory fingerprinting	4 yrs.	2015
District of Columbia, Limited purpose driver license	Applicant cannot have a Social Security number. Applicant must have proof of residency in the District of Columbia for at least 6 months and proof of Social Security ineligibility.	\$47	8 yrs.	2014
Hawaii, Limited purpose driver license	Eligibility requirements are the same as the standard Hawaii driver's license but without the Social Security number requirement.	\$10–\$40 depending on applicant's age	2–8 yrs. depending on applicant's age	2016

continued

State and credential	Application requirements	Cost	Years of validity	Program start year
Illinois, Temporary visitor driver's license	Immigrant with or without legal presence can apply. Applicant must have lived in Illinois for 12 months and have a consular ID or an unexpired passport.	\$30	3 yrs.	2013
Maryland, Driver's license	Applicant must show proof of filing taxes in Maryland for 2 years or be claimed as a dependent of someone who has filed Maryland income tax. Applicant must have ITIN.	\$9 fee per year for a new license \$6 fee per year for renewal	5-8 yrs.	2014
Nevada, Driver authorization card	All citizens and noncitizens may apply for the credential. Applicants need proof of Nevada residency within the past 60 days.	\$23.25 for license, additional \$26 testing fee if needed	4 yrs.	2014
New Jersey, Driver's license	Requirements for a new standard New Jersey driver's license have not fully been established as of July 2020. Requirements for unauthorized immigrants will be the same as for citizens.	\$18	4 yrs.	2021
New Mexico, Driver's license	Eligibility requirements are the same as a standard New Mexico driver's license.	\$18 for 4-yr. license \$34 for 8-yr. license	4 or 8 yrs.	2003
New York, Driver's license	Eligibility requirements are the same as a standard New York driver's license.	\$64.50-\$107.50 depending on applicant's age and where they apply	8 yrs.	2019
Oregon, Driver's license	Eligibility requirements are the same as a standard Oregon driver's license. Applicant must sign an affidavit that they do not have a Social Security number.	\$60 for license \$40 for renewal	8 yrs.	2021
Utah, Driving privilege card	Only applicants who cannot establish legal presence can apply. Applicants must pass a criminal background check and have proof of Utah residency. Applicant must have an ITIN.	\$52 for license if 21+ \$39 for provisional license <21 \$25 for fingerprint processing	1 yr.	2005

State and credential	Application requirements	Cost	Years of validity	Program start year
Vermont, Driver privilege card	The credential is available to citizens and all immigrants. Applicants must have proof of identity, date of birth, proof of Vermont residency, and a letter from the Social Security Administration indicating ineligibility to receive a Social Security number.	\$32	2 yrs.	2014
Virginia, Driving privilege card	Applicants must have resided in Virginia for at least 12 months and have documented income in Virginia. Applicants must pay income taxes in Virginia or be listed as a dependent for someone who does.	\$50	2 yrs.	2021
Washington, Driver's license	Eligibility requirements are the same as a standard Washington driver's license. Applicant must sign an affidavit if they do not have a Social Security number.	\$89	6 yrs.	1993



Collision costs

The National Highway and Safety Administration released a study on the economic and societal impact of motor vehicle accidents for 2010. The economic impacts looked at costs associated with the severity of an automobile accident depending on the abbreviated injury scale (AIS). Costs are broken down into various categories, such as medical care, legal costs, and insurance administration. The study also examined the distribution of costs by payee for each cost category. For our evaluation, we inflated all costs to 2019 dollars. Costs for medical care, legal fees, domestics services, and income were inflated **using the Bureau of Labor Statistics' (BLS) respective index for each area, and all other costs were inflated at BLS's general rate of inflation.** Injury costs were estimated per person and property damage was estimated per vehicle.

The Idaho Transportation Department (ITD) uses the KABCO scale to determine the injury severity of accidents. The National Highway Traffic Safety Administration provides a conversion matrix to convert AIS data into the KABCO scale.

Hit-and-run accidents

ITD provided data on the number of hit-and-run accidents by KABCO scale in Idaho from 2015 to 2019. There were 7,923 hit-and-run accidents over this time period (see exhibit 12).

The KABCO to AIS conversion matrix and cost per accident is applied to the number of accidents to determine the estimated cost of all accidents, including costs by responsible payer and source. The total cost of hit-and-run accidents was \$113.5 million with an average cost per accident of \$14,331 (see exhibit 13). Lost market production and property damage were the largest costs incurred by hit-and-run accidents (see exhibit 14).

Exhibit 12

Hit-and-run accidents by KABCO severity, 2015–2019

Accident severity	2015	2016	2017	2018	2019	Total
No injury	1,146	1,217	1,264	1,065	1,271	5,963
Possible injury	264	244	234	249	222	1,213
Suspected minor injury	149	137	112	103	108	609
Suspected serious injury	30	22	33	27	13	125
Fatality	0	5	3	4	1	13
Total	1,589	1,625	1,646	1,448	1,615	7,923

Source: ITD data

Exhibit 13

Hit-and-run accidents cost by payer, 2015–2019

Payer	Total cost
Federal	\$6,316,341
State	\$3,395,088
Other government	\$1,353,892
Private insurer	\$60,048,402
Other	\$13,075,235
Self	\$29,354,539
Total	\$113,543,497

Source: ITD and NHTSA data.

Exhibit 14

**Unlicensed driver accidents cost by source,
2015–2019.**

Cost source	Total cost
Medical care	\$15,928,136
EMS	\$426,138
Market production	\$32,809,348
Household production	\$10,261,579
Insurance administration	\$10,926,942
Workplace	\$2,245,868
Legal	\$6,713,462
Congestion	\$8,020,043
Property damage	\$26,211,980

Source: ITD and NHTSA data.

Unlicensed driver accidents

ITD provided data on the number of hit-and-run accidents by KABCO scale severity in Idaho from 2015 to 2019. In total there were 1,001 accidents involving unlicensed drivers. The total cost of unlicensed driver accidents was \$39.9 million with an average cost of \$39,831 per accident (see exhibits 15–17).

Exhibit 15

Unlicensed driver accidents by KABCO severity, 2015–2019

Accident severity	2015	2016	2017	2018	2019	Total
No injury	164	86	63	59	81	453
Possible injury	64	46	60	81	42	293
Suspected minor injury	40	32	26	56	14	168
Suspected serious injury	20	18	16	13	10	77
Fatality	2	1	2	0	5	10
Total	290	183	167	209	152	1,001

Source: ITD data.

Exhibit 16

Unlicensed driver accidents cost by payer, 2015–2019

Payer	Total cost
Federal	\$2,745,473
State	\$1,467,088
Other government	\$442,312
Private insurer	\$19,713,014
Other	\$3,291,596
Self	\$12,211,327
Total	\$39,870,810

Source: ITD and NHTSA data.

Exhibit 17

Unlicensed driver accidents cost by source, 2015–2019

Cost source	Total cost
Medical care	\$5,203,673
EMS	\$93,353
Market production	\$17,305,815
Household production	\$5,197,779
Insurance administration	\$2,923,815
Workplace	\$683,011
Legal	\$2,814,091
Congestion	\$1,165,136
Property damage	\$4,484,137

Source: ITD and NHTSA data.

Model design and results



Program design assumptions

We used the following criteria for our model:

Class D requirements would remain the same as Idaho's standard class D license.

Cost and length of validity from Utah's driving privilege card program were used for the driving authorization card.

Application and issuance of license rates from a 2018 **California Research Bureau's study of California's program** was used to determine the distribution of signups over the first 30 months.

Using participation rates from other states' programs and projections, we assumed that 50 percent of all age-eligible applicants would apply for a license over the first 30 months of a program.

Exhibit 18

Base model assumptions

	Class D driver's license program	Driving authorization card program
Age requirement	15 and above	18 and above
Application fee	\$30	\$25
Length of validity for license	4 years	1 year
Unauthorized immigrant participants	17,594	16,936

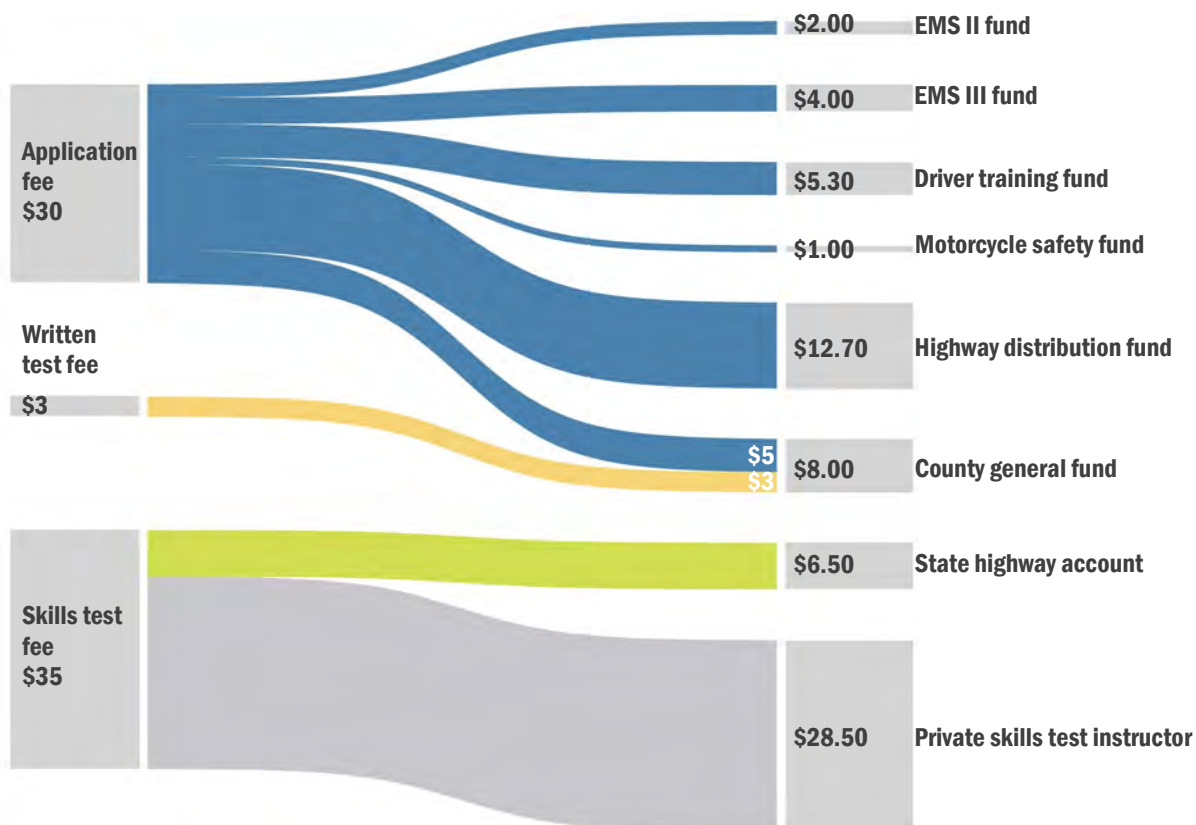
For the purposes of the evaluation, we assumed that only unauthorized immigrants would obtain the new credential. In the case that driving authorization cards were to be extended to citizens or authorized immigrants, the fiscal impacts would likely be minimal as they would be forgoing a class D license to obtain the new credential.

First time applicants in both programs would be subjected to two competency tests, a written test and driving skills test, before being issued a license. Applicants would pay \$3 and \$35 for the written and driving skills tests, respectively. Based off ITD data for failed written tests, we assumed 1.6 written tests administered per license issued. Additionally, we assumed one skills test administered per license issued.

Revenue distribution for driver's license applications is codified in Idaho Code. The distribution of these fees as well as testing fees are shown in exhibit 19.

Exhibit 19

Distribution of driver's license application and testing fees



Using data provided by ITD, we estimated that the cost to the state to issue a credential was \$14.16–\$22.36 per credential in **fiscal year 2019. The lower cost of \$14.16 accounts for driver's licenses and the driver's license records programs directly related** to issuing licenses. It is the number we used in our model.

The higher cost of \$22.36 accounts for all driver services **programs for driver's licenses, such as the license suspension and** reinstatement processes. The higher cost of all driver services is offset by additional sources of revenue, such as license reinstatement fees, and is not included in our model. Reinstatement fees are costs that an individual must pay to reinstate their driving privileges at the end of a license suspension. Reinstatement fees are \$25–\$285 per suspension depending on the cause of suspension.

We used data from the Idaho Sheriff's Association to estimate counties' cost to issue licenses. We estimated that all counties spent \$5,255,677 to issue licenses in fiscal year 2018. Counties issued 431,584 licenses in 2018, which represented a cost of \$12.18 per license issued.

Actual costs for issuing licenses vary from year to year. The costs used in the model are point-in-time costs and do not reflect changes in costs to issue licenses year over year. Actual cost to issue the new licenses and credentials will likely be different than the projected cost because of economies of scale. As the number of licenses issued increases, certain expenses for both counties and ITD are likely to remain fixed.

ITD estimated a cost of \$72,000 to develop a new driving credential program. Additional start-up costs could be incurred by fees paid to Gemalto, the software company contracted by ITD **to process driver's licenses. The contract with Gemalto permits** ITD to create or modify three credentials a year at no cost. Additional credentials that are created or modified in a year cost \$24,000 each.

Model results

Class D licenses would bring in \$795,909 over the first 30 months of a program. Exhibit 20 lists the revenue distribution under 2020 distribution rates for licenses.

Exhibit 20

Total projected revenue by source, class D license

Revenue recipient	Revenue
EMS II/EMS III	\$119,333
Highway distribution fund	\$252,589
Motorcycle safety	\$19,889
Driver training account	\$105,411
Count (application fee)	\$99,444
County (written test fee)	\$84,882
State highway fund (skills test fee)	\$114,361
Total	\$795,909

Revenue for both a class D and driving authorization program would be positive under 2020 cost structures over the first 30 months of a program.

Exhibit 21

Model results

	Class D driver's license program*	Driving authorization card program
Number of driving credential issued	17,594	38,134
ITD cost to issue driving credentials	-\$249,131	-\$539,978
County cost to issue driving credentials	-\$214,254	-\$464,383
Additional program start-up costs	\$0	-\$72,000
Application and testing fees	<u>\$436,915</u>	<u>\$1,200,369</u>
Driving credential balance	-\$26,469	\$124,008
Additional revenue from car title and registration fees	<u>\$783,283</u>	<u>\$783,283</u>
Total balance	\$756,814	\$907,291

* Only includes revenue that goes back to driver's license administration.

Note: Totals may not sum because of rounding.

Responses to the evaluation



I look forward to working with the Idaho Legislature on suggested policies and actions.

—Brad Little, Governor



We feel that it is unlikely that Idaho will see additional revenue related [to] title and registrations based on the passage of a driving authorization card.

—Brian Goeke, DVM Policy Manager
Idaho Transportation Department



It is important that policymakers have a clear understanding of how a driving authorization program for unauthorized immigrants would affect Idaho in areas of automobile insurance, road safety, and criminal justice system.

—Margie Gonzalez, Executive Director
Commission on Hispanic Affairs



Governor Brad Little

*State Capitol :: Boise, Idaho 83720
(208) 334-2100 :: gov.idaho.gov*

January 13, 2021

Rakesh Mohan, Director
Office of Performance Evaluations
954 W. Jefferson St., Ste. 202
Boise, ID 83720

Dear Director Mohan,

I want to thank you and the Office of Performance Evaluations on your thorough report regarding the Driving Authority in the State of Idaho.

These reports are critical resources as stakeholders come together to discuss public policy. As always, I look forward to working with the Idaho Legislature on suggested policies and actions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad Little", is positioned above the printed name.

Brad Little



**Your Safety • Your Mobility
Your Economic Opportunity**

IDAHO TRANSPORTATION DEPARTMENT

Division of Motor Vehicles • dmv.idaho.gov

P.O. Box 7129 • Boise, ID 83707-1129

January 15, 2021

Rakesh Mohan, Director
Office of Performance Evaluation
Sent by Email

Dear Mr. Mohan

First and foremost, the Idaho Transportation Department (ITD) would like to thank the Office of Performance Evaluations (OPE) for their hard work on preparing this report. Additionally, we would like to express our appreciation for being asked to be involved. We feel that OPE balanced well seeking input and asking challenging question while maintaining their objectivity.

We would like to take a moment to address a small portion of the report regarding increased Titles and Registration revenue. Due to some nuances in Idaho Code, we feel that it is unlikely Idaho will see additional revenue related Title and Registrations based on the passage of a Driving Authorization Card. Statute is currently written in a way that allows most unauthorized immigrants to legally obtain a title and registration for vehicles they own. Data supports that many have done this, thus making it unlikely that an increase in these transactions would occur.

ITD does not intend, nor wish, that this minor difference in analysis reflect poorly on any other portions of the report, as ITD does not have any other issues with the report.

Again, we appreciate OPE's effort and collaboration on this report.

Sincerely,

Brian Goeke
DMV Policy Manager
Idaho Transportation Department

cc: Brian Ness, Scott Stokes, Alberto Gonzalez



Brad Little
Governor

Margie Gonzalez
Executive Director

State of Idaho

Idaho Commission on Hispanic Affairs

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January 19, 2021

Rakesh Mohan, Director
Office of Performance Evaluations
954 W. Jefferson St., Ste. 202
Boise, ID 83720

Dear Director Mohan,

On behalf of the Idaho Commission on Hispanic Affairs, I want to thank you and the Office of Performance Evaluations on your thorough report, in response to the 'Driving Authority for Unauthorized Immigrants.'

Idaho like the rest of the nation, is becoming more diverse, primarily because of its fast-growing Hispanic population. Hispanics remain the largest minority group in the State and the fastest growing segment of our population. It is important that policymakers have a clear understanding of how a driving authorization program for unauthorized immigrants would affect Idaho in areas of automobile insurance, road safety, and criminal justice system.

I want to commend and thank the Office of Performance Evaluations for your thorough research, this data will be a tool for lawmakers to make the most informed decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "Margie Gonzalez".

Margie Gonzalez,
Executive Director

